

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMES BONOMO,	:	07 Civ. 5967 (CM) (KNF)
Plaintiff,	:	
-against-	:	Declaration of
	:	<u>James A. Batson, Esq.</u>
MITSUBISHI INTERNATIONAL	:	
CORPORATION,	:	
Defendant.	:	
-----		X

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

James A. Batson, being duly sworn, deposes and says:

1. I am a partner with the law firm of Liddle & Robinson, L.L.P., counsel for Plaintiff James Bonomo. I submit this affirmation in support of Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Sanctions Against Defendant and to submit certain exhibits and evidence into the record before this Court.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the deposition of Richard Lovell.

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's Exhibit 15.

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiff's Exhibit
40.

5. Attached hereto as Exhibit D is a true and correct copy of Plaintiff's Exhibit
62.

6. Attached hereto as Exhibit E is a true and correct copy of Plaintiff's Exhibit
66.

7. Attached hereto as Exhibit F is a true and correct copy of Plaintiff's Exhibit
76.

8. Attached hereto as Exhibit G are true and correct copies of Plaintiff's
Exhibits 29, 38, 49, and 52.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 10, 2008

/s/James A. Batson
James A. Batson
jbatson@liddlerobinson.com
Liddle & Robinson, L.L.P.
800 Third Avenue
New York, New York 10022
(212) 687-8500

CERTIFICATE OF SERVICE

I hereby certify that, on this 10th day of June, 2008, a true and accurate copy of the attached

AFFIRMATION OF JAMES A. BATSON, ESQ. was served by ECF upon the following:

Stephen P. Sonnenberg, Esq.
Paul, Hastings, Janofsky & Walker, L.L.P.
75 East 55th Street
New York, New York 10022

/s/Michael E. Grenert
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